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File With _____

SECTION 131 FORM

Appeal NO: ABP 314685

TO: SEO

Defer Re O/H ☐

Having considered the contents of the submission dated/ received 22/12/24
from

Lily Conaty I recommend that section 131 of the Planning and Development Act, 2000
be not be invoked at this stage for the following reason(s): no w 131

E.O.: [Signature]

Date: 23/12/24

To EO: _____

Section 131 not to be invoked at this stage. ☐

Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached
submission

to: _____

Allow 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORMAppeal No: ABP 314485Please treat correspondence received on 22/12/24 as follows:

1. Update database with new agent for Applicant/Appellant _____

2. Acknowledge with BP 233. Keep copy of Board's Letter ☐

1. RETURN TO SENDER with BP _____

2. Keep Envelope: ☐3. Keep Copy of Board's letter ☐

Amendments/Comments

4. Attach to file

(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☒RETURN TO EO ☐EO: [Signature]Plans Date Stamped ☐Date Stamped Filled in ☐AA: F. KhattipovDate: 23/12/24Date: 24/12/24

Daragh Cassells

James

From: B BEYER <bbeyer2021@gmail.com>
Sent: Sunday 22 December 2024 23:32
To: Appeals2
Subject: Lily Conaty Observation 314485 Relevant Action
Attachments: Lily Conaty ABP Observation RA December 2024.docx

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi James,

Please find observation attached for Lily Conaty for Relevant Action Draft Decision Case # 314485.

Thank you,

Bernadette
085-8640064

Lily Conaty

Coolquoy,

The Ward,

Co. Dublin. D11TF62

Date: 21st December 2024

Attention: An Bord Pleanála,

Re: Case # 314485

Draft Decision Relevant Action.

Dear Board,

My comments still stand as per my last observation. Now with new details emerging from the draft decision, it is very worrying that ABP will rubberstamp the divergent flight path without going through the proper planning process. I am disappointed to learn that ABP inspector did not seek clarification from IAA regarding the flightpath and would rather take the comments from DAA at face value, who we as the public know, DAA to be a deceiving entity that continue to break the law by breaching their various planning conditions including:

- 1. Passenger Cap (breached in 2019 & 2023 and by Nov 2024)**
- 2. Flight Paths (continue to breach since opening of NR opened in 2022)**
- 3. Night Flights (continue to breach with more than 110 movements per night)**

Why would ABP ever consider that what DAA say in an application to be fact without consulting the regulator as in this this case, the IAA.

Why would ABP even consider entertaining a planning application from an applicant, such as DAA, that are already clearly breaching planning conditions.

As I mentioned before, we moved to Coolquoy, The Ward in 1983, and we raised seven children in this peaceful north Dublin rural village setting. I am very engaged with the local community and attend all the local meetings. Our community has been left in the dark about the north runway and these flight paths. I don't feel we are being treated fairly.

I had knee replacement and doctors said part of my long-term recovery is to continue exercising and using my knee as much as possible so I purchased a bicycle. I loved cycling the quiet country roads and lanes around Coolquoy, Kilcoskan and Corrstown for the last two years after my operation but now that has been taken away from me. I can no longer go out on my bicycle as I am now afraid with the loud noise from enormous airplanes going overhead, that I cannot hear a car or any type vehicle coming behind me. It's frightening.

The ongoing noise now inside our homes has spiked as we constantly have to raise our voices over the noise of the airplanes, the volume of the TV has increased and the overall noise levels have increased in our homes because of the north runway. We never ever had any issue before this. I am worried about the consequences this will have on my long-term hearing and the rest of my families hearing too. We are all badly affected by the north runway and this flight path over Coolquoy / Kilcoskan.

I am an avid gardener and love planting all my flowers in the springtime. This joyful past time allows me to spend hours and hours, days and days in the fresh air in my beautiful garden that gives me great peace and tranquillity. But now this new runway has taken this away from me, with the noise of the airplanes overhead all day long can be unbearable.

I am concerned for the wellbeing of my children and my grandchildren who live in this area. My grandchildren attend Kilcoskan National school and Tippy Toes Pre-school in the area and they are severely impacted with this constant noise. They never get a break from it. Children are being exposed at Kilcoskan National School of Noise levels at 84dB and louder. This is the same situation for me in my home and when my children and grandchildren visit me. We live next to Kilcoskan National School so this level of noise 84dB+ is the same for me.

I was a volunteer in our local Nursing home called Newpark in The Ward, and during summer months residents would be seated outside, allowing them to enjoy the sunshine and peaceful surroundings. But now this loud aircraft noise will be very difficult for them to understand and to be able to bear it. I worry about their wellbeing.

I really wish we could get back to the peaceful rural setting that we had before this north runway opened. We were never warned that these flights paths were going to go over homes.

Please REFUSE PERMISSION to DAA on this Relevant Action Draft Decision.

I have attached some photographs of flights going over my home and my beautiful garden.

Other points I would like to highlight:

Introduction

The Inspector's Report has rightly concluded that the adverse impact of the Relevant Action on the surrounding communities would be too severe to justify granting permission. The proposal's request for additional hours of operation on the north runway and a projected increase in night-time activity would result in significant additional awakenings, which are well-documented to cause substantial health and well-being consequences, including increased risks of cardiovascular disease, mental health disorders, and sleep-related cognitive impairments.

Given these findings, it is essential that any current or future expansion of airport activity during night-time hours be disallowed but at the very least strictly limited by a movement cap of 13,000 annual night-time flights, as proposed.

Proposed operations on the north runway from 6am to midnight presents unacceptable risks to health and quality of life, and in particular will cause further catastrophic and unreasonable sleep disruption for residents and families already suffering due to north runway flightpaths.

The following summary points highlights the inadequacies of the DAA application:

1.0 Inadequacy of DAA Application

- The Dublin Airport Authority (DAA) application fails to assess or mitigate the adverse effects of nighttime noise adequately. Average metrics like % Highly Sleep Disturbed (HSD) and L_{night} fail to capture acute impacts such as awakenings, which have immediate and long-term health consequences¹.
- The inspector has defined that more than 1 additional awakening per night as a result of aircraft noise is a significant adverse impact².

2.0 Insulation Limitations:

- Insulation measures cannot fully mitigate nighttime noise due to factors like open windows, low-frequency noise, and peak noise events. The WHO average insulation value of 21 dB assumes windows are open 20% of the year, making insulation less effective.
- The introduction of a new insulation criteria of 80dB L_{ASMax} is welcomed, however, without a detailed set of maps indicating who qualifies for this the decision is incomplete.
- The proposed grant value of €20,000 is considered inadequate to fully insulate those homes that qualify. Comparisons to other EU countries are incomplete and do acknowledge the fact that construction costs in Ireland and particularly Dublin are close to the highest in the EU. The scheme should be redesigned to cover the full cost of insulation.
- Residential Noise Insulation Scheme (RNIS) and Home Sound Insulation Program (HSIP) do not meet modern health protection standards. Insulation is unsuitable for nighttime impacts and cannot substitute for operational restrictions like movement caps.

3.0 Necessity of the Movement Limit and Rejection of the Additional North Runway Operating Hours:

- The movement cap of 13,000 nighttime flights is critical to reducing noise impacts and protecting public health. Without this cap, noise exposure levels will rise significantly, endangering the well-being of nearby residents.
- The proposed additional operating hours from 6am to 7am and from 11pm to midnight on the north runway are completely unacceptable. The flightpaths in operation from north runway are causing huge suffering, distress and sleep disturbance for tens of thousands of people in Fingal and Meath.
- Adding a further two hours to the schedule when most people are trying to sleep only makes and unreasonable situation even worse. The flightpath issue must be solved firstly before any other changes can be considered. For context, there were 40 departures between 6am and 7am on Monday 16 December 2024. This is the busiest hour of each day at the airport. It

¹ [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/650787/IPOL_STU\(2020\)650787_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/650787/IPOL_STU(2020)650787_EN.pdf)

² The inspector has concluded "in conjunction with the board's independent acoustic expert that the information contained in the RD and the RA does not adequately demonstrate consideration of all measures necessary to ensure the increase in flights during the nighttime hours would prevent a significant negative impact on the existing population."

would be disastrous if these 40 departures were switched to the North Runway because they would now be taking a divergent turn and flying low (on full power while turning) over communities who should not be under or near to a flightpath. The volume and frequency would be much greater in the summer period.

4.0 Unauthorised Flight Paths and Breach of Planning Conditions

- The DAA has implemented flight paths that deviate significantly from those approved in the Environmental Impact Statement (EIS). These unauthorised deviations expose previously unaffected areas to significant noise impacts, creating unassessed risks.
- The deviations breach Condition 1 of the planning permission, which requires adherence to the originally assessed flight paths. No updated Environmental Impact Assessment (EIA) or planning application has been submitted for these changes.
- Affected communities have and are experiencing unreasonable noise levels without proper consultation or mitigation measures. Local schools have been impacted. The impact has been devastating for communities with families now feeling like they have no option but to sell their homes.
- The unauthorised flight paths undermine the planning system's integrity, setting a dangerous precedent for future projects. Granting permission under these conditions violates planning laws and obligations under the EIA Directive.
- There are multiple possible means of compliance with the pertinent ICAO regulations. IAA has received and approved only the one chosen by daa as Aerodrome Operator.
- Any inference or implication that IAA instructed or caused daa to deviate from the route approved in their planning permission is **not correct**.

5.0 Night Flight Restrictions in Europe and Implications for Dublin

- Major airports like Schiphol, Heathrow, and Frankfurt enforce strict caps or curfews on nighttime flights. Dublin's proposed 31,755 annual nighttime flights far exceed these airports' limits relative to passenger numbers.
- European airports prioritize reducing noise exposure to mitigate sleep disruption, cardiovascular risks, and stress.
- Adopting the 13,000-flight cap aligns Dublin with international best practices, ensuring proportional and sustainable operations.
- Without the movement limit the Noise Abatement Objective (NAO) set by ANCA for Dublin Airport cannot be fully achieved.

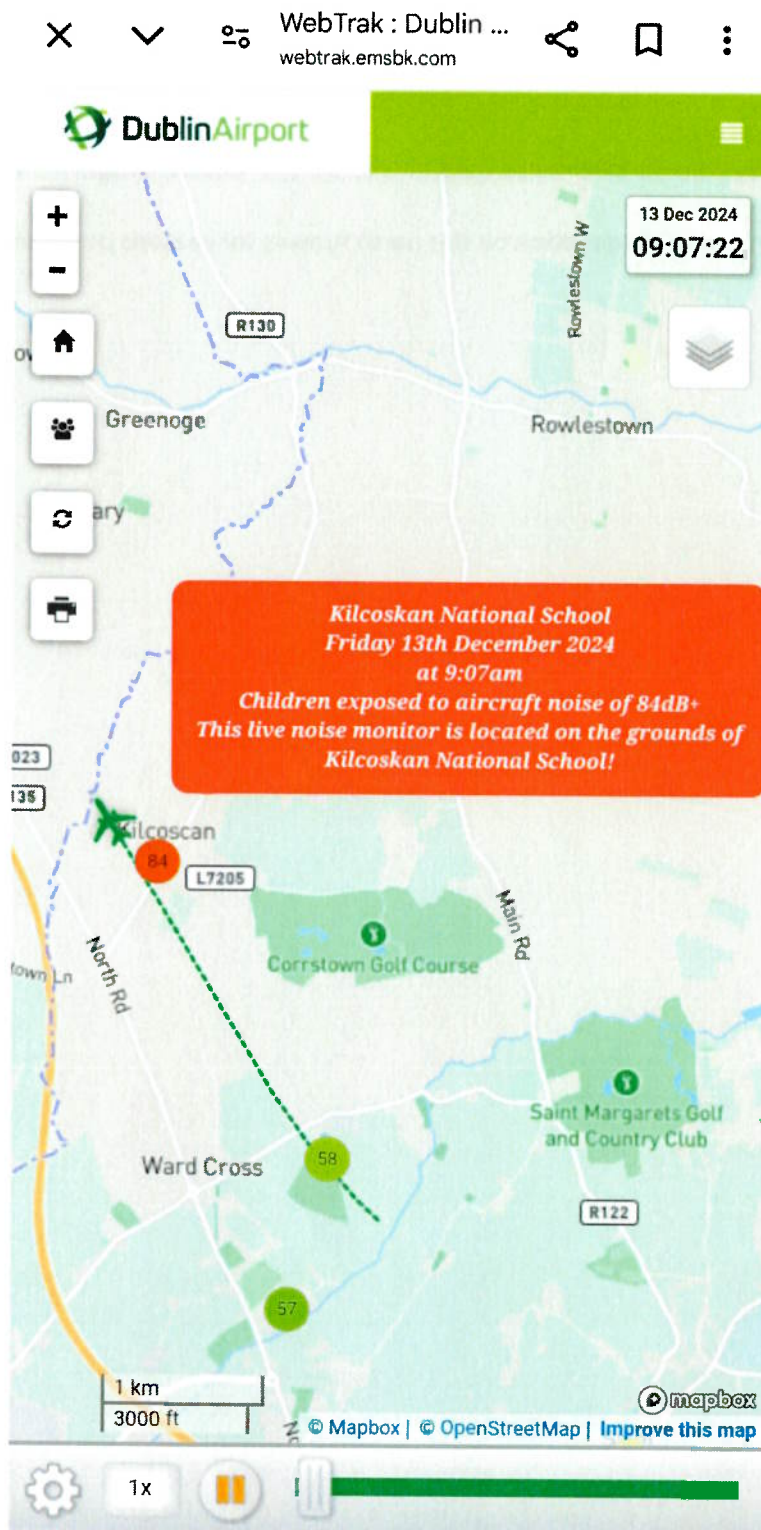
6.0 Health and Environmental Impacts

- Chronic exposure to nighttime aircraft noise increases the risks of cardiovascular disease, hypertension, and mental health issues. Children's cognitive development is adversely affected, impairing memory, learning, and overall performance.
- Health-related costs, including healthcare expenses and reduced productivity, are substantial and long-term. For example, Brussels Airport's health cost analysis suggests similar impacts at Dublin could reach €750m annually.
- The DAA analysis has not used the correct population datasets in determining the impacts. This underestimates the impact on the communities around the airport.
- Evidence from health agencies emphasizes that noise-induced sleep disturbance is a significant environmental health risk. Ignoring these risks contravenes principles of sustainable development and public health protection.

7.0 Recommendations

- Immediately halt unauthorised deviations and revert to the flight paths approved under the original EIS.

- At the very least, maintain the cap of 13,000 nighttime flights to prevent further degradation of community health and well-being, however due to the severity of the projected health and environmental impacts that nighttime aircraft noise presents, a complete ban on night-time flights should be strongly considered.
- Implement the Noise Quota System to incentivize quieter aircraft and ensure proportional operations.
- Reject the proposed additional hours of operation on the north runway for reasons outlined.



Flights going over Kilcaskan National School / my family home is located next to school at 84db. How can we tolerate this noise morning, noon and night? No amount of insulation can allow you enjoy your garden in peace.










We recently upgraded our windows in our home. The costing was astronomical compared to the miserable €20,000 that DAA are proposing to offer. Who sets this price? Obviously inflation has not been taken into account as €20,000 cost 4 years ago is not the same for todays cost prices.

Here is a report from our windows company FAIRCO:



Acoustic Performance

Glazing Configuration

8.76mm (44.2) LamiGlass Sound Reduction
14mm Cavity
6mm Float Glass

Sound Reduction Indices

Frequency, Hz / dB*						Rw	C	Ctr	OITC	STC
125	250	500	1000	2000	4000	41	-2	-6	32	41
26	30	38	47	45	57					

*The values expressed in the frequency table correspond to the central values of the 1/3 octave band

Disclaimer: The acoustic performance data provided in the reports is based on a test protocol or an estimation and may be used if user actual glazing is identical to input data described herein. Acoustic performance data herein is only applicable for glazing dimensions 1.23 m x 1.48 m (as per testing standard). Estimation of acoustic performance is based on component-similarity assumptions which are derived from measured data and interpolation to expand the database of values from test protocols. Due to inherent variations in acoustic performance when testing in accordance with EN ISO 10140-3/EN ISO 10140-2, some variation in the calculated performance can also be expected. As such, the weighted performance, Rw, and adaptation terms, C and Ctr, should typically be considered to be accurate within ±2 dB. However, wider deviations can occur. Actual performance may vary according to the glazing dimensions, frame system, noise sources and many other parameters. The acoustic performance data herein should not be used as a substitute for tests of actual glazing. For more information, please consult Assumptions and Terminology section in Guardian Acoustic Assistant. By accessing this calculator, you agree not to alter or modify the generated report data and information, by any means. Any manual alteration will be your own responsibility and will annul all the content of the report.

Monday, December 16, 2024 | Acoustic database 20221229


Top Sleeping Tips for Seniors

HELPFUL SLEEPING TIPS FOR SENIORS



- ☐ AVOID LONG NAPS
- ☐ LIMIT CAFFEINE & ALCOHOL INTAKE
- ☐ REVIEW MEDICATIONS OR SUPPLEMENTS
- ☐ IMPROVE SLEEP ENVIRONMENT (DARK & QUIET)
- ☐ KEEP ROOM AT OPTIMAL TEMP (65°F)
- ☐ CHOOSE MATTRESS DESIGNED FOR OLDER ADULTS
- ☐ CONSIDER OVER-THE-COUNTER PAINKILLERS



- **Follow a regular bedtime schedule:** Try to go to sleep and wake up at the same time daily, even on weekends and holidays. This allows your body to get into a rhythm and know when it's time to shut down and boot up. Keep in mind, it's very common for older adults to go to sleep earlier and wake up earlier compared to younger adults. This isn't a problem at all.
- **Minimize your daytime "cat naps"** to 20 minutes. Napping too much can prevent you from sleeping well at night.
- **Do not consume caffeine and alcohol at night.** Avoid caffeine up to 8 hours before bedtime, and avoid alcohol after dinner.
- **Improve your sleep environment.** Try to fall asleep in a dark and quiet environment. You can have some ambient light or low-volume sound machines, but it's best to avoid harsh lighting and loud noises that can keep you up at night.
- **Set an optimal room temperature.** Experts generally recommend keeping the room at about 65°F (18°C).
- **Buy a new mattress designed for older adults.** They provide extra support to help  sleep better.

How are we expected to get 8-9 hours of sleep per night with roaring jets of 84dB flying over our bedroom window if the Relevant Action is granted? It is our human right to a peaceful night of sleep and it will be taken away from us, our children and our grandchildren because of greed. Dublin Airport DOES NOT need to have flights between 11pm – 7am. Money, money, money is the only reason that this Relevant Action is being pushed by corporations and is all at the expense of the health and wellbeing of local residents especially our children and future generations.

Please REFUSE PERMISSION on this Relevant Action Draft Decision.

Many thanks,

Lily Conaty

085-14177324

Lilyconaty1@gmail.com